

IDEC

Pharmaceuticals Corporation

3030 Callan Road
San Diego, CA 92121

ATTACHMENT 6 AGENDA ITEM 14

July 30, 2003

Mr. Hashim Navrozali
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Ste 100
San Diego, CA 92124

RE: Tentative Order No. R9-2003-0140

Dear Mr. Navrozali:

IDEC Pharmaceuticals Corporation (IDEC) hereby submits its comments to Tentative Order No. R9-2003-1040 for the New IDEC Manufacturing Operation (NIMO) located in Oceanside. The comments are as follows:

1. The contact information should list IDEC's current corporate address as 3030 Callan Road, San Diego, CA 92121, telephone number 858.431.8500. ✓
2. Under section 3A of the fact sheet, the Facility is currently being developed on approximately 45 acres, however, IDEC owns approximately 90 acres in the Ocean Ranch Business Park. Also, the manufacturing facility should be more generally described as "for the production of monoclonal antibodies for cancer and autoimmune diseases." It is unknown if either Rituxin or Zevalin will be produced at that site. In section 3B, last sentence, it should be clarified that the bulk liquid final fill operations will be conducted at an offsite location. ✓
3. Under section 4A(1), please clarify that the waste brine test data provided was from IDEC's operations located at it Oceanside (NICO) facility, not the Torreyana facility.
4. Under Item 4A(2) of the fact sheet, page 5, Pretreatment of Water for Injection (WFI) IDEC would like to clarify that sulfuric acid may be injected prior to the last Simplex Softner (see attachment 3 of the fact sheet, NIMO Sewer and Brine flows). The 20% sulfuric acid will be added to adjust the pH to between 7 and 8.3 for the purpose of driving ammonia (NH3) ions to ammonium (NH4) ions. This is necessary to ensure proper function of the WFI vapor compression still. It is estimated that 35 gallons of sulfuric acid may need to be added to every 2,500 gallons of water to ensure proper pH.
5. Under Item D, Storm Water Discharges, IDEC would like to clarify that the Notice of Intent (NOI) that was previously submitted was for coverage under the general permit for Construction Activities and the an NOI for coverage under the General Permit for Industrial Activities will be submitted once construction is complete this fall. The NOI for construction activities may be Terminated or modified to more accurately reflect the area of the site under construction.

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6. Under the Monitoring and Reporting section there are various items that reference a July 2003 start date for monitoring. It is anticipated that monitoring would not commence until the first discharge from the NIMO site. This is not expected until late 2003 or early 2004 based on the construction completion date of the City of Oceanside's brine line.

There are no other clarifications or comments at this time. Please feel free to contact me at 619.778.2500 if you have questions or require additional information.

Sincerely,



Joseph R. Hess
Manager EH&S, New Projects